

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ADAM TIJERINA

PLAINTIFF

vs.

No. 5:22-cv-928-XR

NATIONAL DEBT RELIEF, LLC

DEFENDANT

OPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER DISCOVERY

Plaintiff Adam Tijerina, by and through his undersigned attorneys of the Sanford Law Firm, PLLC, for his Motion for Extension of Time to Answer Discovery states as follows:

1. Plaintiff filed this action on August 26, 2022. See ECF No. 1.
2. On March 9, 2023, Defendants served Plaintiff with the First Set of Interrogatories, Requests for Production and Requests for Admissions ("Requests"), with Plaintiff's written responses due on April 10.
3. In recent weeks, lead attorney Laura Edmondson resigned as a member of Sanford Law Firm PLLC, and the case was reassigned to attorney Colby Qualls.
4. Further, since service of the Requests, both the paralegal assigned to the case and other individuals of Sanford Law Firm, PLLC, were affected by the EF3 tornado that devastated parts of Little Rock and the surrounding areas on March 31.
5. In light of the above reasons, Plaintiff requests a 14-day extension of time to respond to Defendant's Requests.
6. Plaintiff makes this request in good faith; this motion is made for good cause and not for the purpose of delay.

7. Counsel has conferred with Defendant, by emails between attorneys, and Defendant's counsel has advised that Defendant opposes this motion. Defendant said that it would agree to a 14-day discovery extension only if Plaintiff would agree to consent to a counterclaim.

WHEREFORE, premises considered, Plaintiff respectfully prays that the Court grant this Motion and extend Plaintiff's time to answer Defendant's Requests, up to and including April 24, 2023.

Respectfully submitted,

PLAINTIFF ADAM TIJERINA

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CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing MOTION was filed via the CM/ECF system, which will provide notice to the following attorneys of record:

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/s/ Josh Sanford

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